

E. Clifton Knowles

## U.S. Magistrate Judge

**Civil Action No.: 3:14-0957**  
**JURY DEMAND**

Plaintiff Telos Holdings, Inc. d/b/a Point Classics (“Point Classics”) respectfully requests the Court for leave to amend its Complaint pursuant to Fed. R. Civ. P. 15 and to add parties pursuant to Fed. R. Civ. P. 20 and 21. Plaintiff files simultaneously herewith its Memorandum of Law in Support of its First Motion to Amend Complaint pursuant to Local Rule 7.01(a). Point Classics seek to add as a party Henry Hadaway Organisation Ltd. (“HHO #1), HHO Licensing Limited (“HHO #2”), and Henry Hadaway (“Hadaway”) (collectively, the “HHO Parties”). Point Classics asserts claims against the HHO Parties for declaratory relief regarding the parties’ rights to certain sound recordings, copyright infringement, and accounting. A copy of the First Amended Complaint is attached as Exhibit 1 to this motion. Point Classics seeks to file the First Amended Complaint within the time provided for within the Federal Rules as the only existing party that has been served, S.A.A.R., SrL, has not yet filed its Answer and Point Classics is in the process of serving Believe Digital via The Hague Convention after efforts to negotiate a